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Attorneys for Defendant
Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION FOR A
CONTINUANCE OF TRIAL DATE [DKT.
NO. 1603]**

Courtroom: 8
Judge: Hon. William Alsup
Trial: October 10, 2017

I, Hayes P. Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Its Motion for a Continuance of Trial Date ("Motion") [Dkt. No. 1603].

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Motion	Portions Highlighted in blue at 13:23-24 and Footnote 3

3. The highlighted portions of the Motion described above at page 13 include highly confidential, sensitive business information relating to the structure Otto Trucking's agreements and Otto Trucking's corporate structure. This information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Otto Trucking's detriment, including in the context of negotiating business deals. If such information were made public, I understand Otto Trucking's competitive standing could be significantly harmed.

4. I further understand that the information in the Motion and Exhibits attached thereto are the subject of numerous protective orders that have been or will be filed.

5. Defendant's request to seal is narrowly tailored to those portions of the Motion that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of September, 2017 in San Francisco, California.

/s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 20, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 20th day of September 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde